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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: : Chapter 11

BLEACHER CREATURES, LLC, : Case No.: 17-13162 (JKF)

Debtor. : Related Docket No. #191

Hearing Date: April 25, 2018 at 9:30 a.m.

_____: Obj. Deadline: April 3, 2018

NOTICE OF HEARING REGARDING MOTION OF MAJOR LEAGUE BASEBALL PLAYERS ASSOCIATION FOR (I) ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM AND (II) ACCOUNTING OF DEBTOR SALE PROCEEDS

PLEASE TAKE NOTICE that on March 20, 2018 Major League Baseball Players Association ("MLBPA"), by and through its attorneys, filed its Motion for the entry of an order (I) allowing its administrative expense claim, (II) compelling immediate payment of the administrative expense claim, and (III) compelling the Debtor to account for the sale of all products bearing MLBPA's rights and marks during the course of this bankruptcy case pursuant to Section 503 of the Bankruptcy Code and Rules 2004 and 9014 of the Federal Rules of Bankruptcy Procedure (the "Motion") with the United States Bankruptcy Court for the Eastern District of Pennsylvania, 900 Market Street, Suite 400, Philadelphia, PA 19107 (the "Bankruptcy Court"). A copy of which you were previously served.

PLEASE TAKE FURTHER NOTICE that any objections to the Motion are to be made in writing, filed with the Bankruptcy Court, and served upon, so as to actually be received by the undersigned, on or before **April 3, 2018**.

PLEASE TAKE FURTHER NOTICE that if an objection is filed, a hearing on the Motion may be held before the Honorable Jean K. FitzSimon at the Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107, on <u>April 25, 2018 at 9:30 a.m.</u> (prevailing Eastern Time).

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PLEASE TAKE FURTHER NOTICE that if no objection is timely filed in accordance with the procedures enumerated above, the Bankruptcy Court may enter an Order without further notice or hearing.

Dated: March 26, 2018

Philadelphia, Pennsylvania

McCARTER & ENGLISH, LLP

s/ Glenn P. Callahan

Glenn P. Callahan (PA# 48355) 1600 Market Street, Suite 3900 Philadelphia, Pennsylvania 19103

Telephone: 215.979.3882 gcallahan@mccarter.com

Attorneys for Major League Baseball Players Association

CERTIFICATE OF SERVICE

I, Glenn P. Callahan, Esquire, hereby certify that on March 26, 2018, a true and correct copy of the foregoing *Notice of Motion of Major League Baseball Players Association for (I)*Allowance and Payment of Administrative Expense Claim and (II) Accounting of Debtor Sale Proceeds was caused to be served upon the below listed parties via First Class Mail, postage prepaid or in the manner so indicated.

s/ Glenn P. Callahan
Glenn P. Callahan (PA# 48355)

Michael Jason Barrie Benesch Friedlander Coplan & Aronoff LLP One Liberty Place 1650 Market Street, Suite 3628 Philadelphia, PA 19103-7301

Bleacher Creatures, LLC 527 Plymouth Road, Suite 407 Plymouth Meeting, PA 19462

Beneficial Mutual Savings Bank 1818 Beneficial Bank Place 1818 Market Street Philadelphia PA 19103 George M. Conway United States Trustee 833 Chestnut Street Suite 500 Philadelphia, PA 19107

Thomas D. Bielli, Esquire Bielli & Klauder, LLC 1500 Walnut Street, Suite 900 Philadelphia, PA 19102